

JOSEPH & KIRSCHENBAUM LLP  
Attorneys at Law

---

Charles Joseph  
D. Maimon Kirschenbaum  
Denise Schulman  
Josef Nussbaum  
Lucas Buzzard  
Leah Seliger  
Michael DiGiulio

32 Broadway, Suite 601  
New York, NY 10004  
Tel: 212-688-5640  
Fax: 212-981-9587  
www.jk-llp.com

October 1, 2024

**VIA ECF**

Hon. Jennifer L. Rochon  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: Martinenko v. 212 Steakhouse, Inc.  
No. 22 CV 518 (JLR) (RWL)**

Dear Judge Rochon:

We are Class Counsel in the above-referenced action. I write to respectfully request that the deadline for our motion for attorneys' fees and costs be held in abeyance pending the parties' completion of the meet and confer process regarding the next steps in this litigation and/or entry of a final judgment. As the Court is aware, a judgment as to most of the claims in this action was entered on September 25, 2024, so under Fed. R. Civ. P. 54(d) Plaintiffs' motion for attorneys' fees and costs is currently due on October 9, 2024. Pursuant to the Court's summary judgment Order, the parties are in the process of conferring about the remaining NYLL § 195 claims in this action, and it is possible that the result of that meeting and confer process will be that a final judgment can be entered in the near future. We seek this adjournment because if a final judgment is entered soon it would be more efficient to make a single fee application at that time that would include all attorney time. This is the first request for an extension of this deadline, and Defendants consent to the request. We thank the Court for its attention to this matter.

Respectfully submitted,

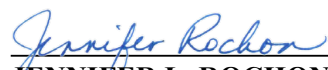
/s/ Denise A. Schulman  
Denise A. Schulman

cc: All counsel (via ECF)

The request is GRANTED in part. Plaintiffs' deadline for their motion for attorneys' fees and costs is extended to November 8, 2024.

Dated: October 2, 2024  
New York, New York

**SO ORDERED.**

  
**JENNIFER L. ROCHON**  
United States District Judge